

I have been in the radio broadcasting industry since 1974, beginning as on-air personality, moving into the sales department and eventually into Sales Management and General Manager. My career in this business has taken me to seven different smaller markets in the Upper Midwest. In virtually all of these areas (and most others that I am aware of), there was an over-abundance of radio stations. This results in many stations that are unable to serve their community very well because they just can't afford it. They automate instead of employing announcers, drop current weather reports or local news, and even worse, offer no storm warnings when weather conditions are threatening. Our station, KIKV, a 100,000 watt FM located in Alexandria, Minnesota, works hard at serving our community with weather warnings, community-oriented PSA's, weekly community affairs interviews, fund-raising for worthwhile local projects, and other important events in the local community. If there is a worthwhile community project or campaign, we want to help make it a success with our on-air support.

With the abundance of radio signals in the majority of markets in America

today, I feel that we do not need or want low power FM's. They would be more weak stations that would not be able to serve the community and also hurt the stations that are trying hard to preserve their signals and serve their communities as they always had.

I am opposing low power FM=92s for these reasons:

1) LOW POWER FM WILL CAUSE INTERFERENCE TO EXISTING STATIONS.

Because the FCC would have to alter its existing interference protection standards, it would result in even more interference to existing signals, and thus a loss of service to listeners.

2) LOW POWER WILL NOT ACHIEVE WHAT THE FCC WANTS. If the FCC eliminates

second and third adjacent channel protections, very few stations would be available in the urban markets. Serving urban communities and neighborhoods is a stated goal of the FCC in allowing low power FM. Under this proposal, or any proposal, there would not be enough spectrum for those who are interested in a low power FM. How would the FCC handle the requests?

3) LOW POWER FM WILL NOT CREATE VIABLE STATIONS TO INCREASE FEMALE AND MINORITY OWNERSHIP. How do you guarantee that minority and female owners

will apply and then actually receive a license? And, the economic viability and stability of low power stations is questionable.

4) LOW POWER FM WILL ONCE AGAIN CREATE THOUSANDS OF NEW STATIONS similar

to the 1980=92s when the FCC created the "80-90 Docket". That allowed to=

many stations in markets, ensuring that many would not succeed because there simply was not enough revenue to support all of these added stations. Obviously this forced the FCC to loosen ownership rules and has now resulted in mega-broadcasting companies. The Commission should not travel down this road again. One huge mistake was made then, let=92s not compound it and make it worse.

5) LOW POWER FM CAN ONLY BE AN ADMINISTRATIVE NIGHTMARE TO THE FCC.

With limited resources, how can the Commission provide assistance to LPFM applicants as it proposes, when assistance has never been given to full-power stations. There would also be the increased regulatory and enforcement burden not only for the newly-licensed LPFM stations, but also for all of the unlicensed "pirate" radio stations that refuse or are

unable to obtain licenses and continue to broadcast. The Commission is proposing to place amateur stations in the middle of a mature service.

6) LOW POWER FM PROPOSALS FOR 1-10 WATT STATIONS ARE AN INEFFICIENT USE

OF THE SPECTRUM. The Commission altered its rules in 1978 to prohibit further licensing of 10 watt "Class D" noncommercial educational stations

because it determined the spectrum could be used more efficiently by larger stations that can reach more people. The same remains true today.

7) LOW POWER FM WILL HARM THE DEVELOPMENT OF IN-BAND, ON-CHANNEL (IBOC) DIGITAL RADIO. The proponents IBOC digital radio have been developing their systems based on the current interference protection standards. The systems utilize "sidebands" of the analog signal to transmit the digital signal without the need for additional spectrum. Any alteration to the second-adjacent channel spacing restrictions could harm radio broadcasters in their transition to digital.

I want to be emphatic on how much of a danger Low Power FM will be to existing radio signals. The interference problems they will cause will cost broadcasters thousands and thousands of dollars to try to correct a damaged signal. Full-power operators will be forced to spend money that we don't have. Does the Commission really want to drive more of us out of business?

I should also point out that our station devotes hundreds of hours of free air time to local news and information. We air an average of 12,000 public service announcements each year. With Agriculture being a vital part of our local economy, we also devote ten hours per week for Farm programs. We recently won a national award from the NAB for our fund-raising efforts to help end child abuse in three of our local counties. We take our commitment seriously to local programming and to serving our communities. Low power FM's will force our attention away from what we do best: serving the needs of our communities.

Please do not allow low power FM's -- they will destroy Full Power

broadcasting and the industry that I love.

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